

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

FARMERS)	
TELECOMMUNICATIONS)	
COOPERATIVE, INC.,)	
)	
Plaintiff,)	
)	
v.)	CIVIL CASE NO. 2:06cv-790-VPM
)	
VERIZON COMMUNICATIONS INC.,)	
VERIZON BUSINESS, QWEST)	
COMMUNICATIONS)	
INTERNATIONAL, INC., and Fictitious)	
Defendants A, B, C, and D,)	
)	
Defendants.)	

**JOINT MOTION TO DISMISS VERIZON COMMUNICATIONS INC. AND
QWEST COMMUNICATIONS INTERNATIONAL, INC. AS DEFENDANTS
AND TO SUBSTITUTE PARTIES**

Plaintiff Farmers Telecommunications Cooperative, Inc. and Defendants Verizon Communications, Inc., Verizon Business Network Services, Inc., and Qwest Communications International, Inc. ("QCII"), hereby jointly move the Court to dismiss with prejudice Verizon Communications Inc., and QCII as Defendants and to substitute Verizon Business Network Services, Inc. for the party previously denominated as Verizon Business, and to substitute Qwest Communications Corporation ("QCC") for QCII as the properly-designated defendants to the Complaint. The Joint Movants respectfully show the Court as follows:

1. Verizon Business Network Services, Inc. is the legal name of the entity that Plaintiff identified as "Verizon Business" in the Complaint.

2. Verizon Business Network Services, Inc. is a wholly-owned subsidiary of MCI Communications Corporation, which in turn is a wholly-owned subsidiary of MCI, LLC.

3. MCI, LLC is a wholly-owned subsidiary of Verizon Communications, Inc., a publicly-held corporation.

4. Verizon Communications, Inc. does not provide any telecommunications services and does not have any involvement with the subject matter of the Complaint.

5. Verizon Business Network Services, Inc. stipulates that Verizon Business Network Services, Inc. is properly joined as a defendant in the Complaint.

6. Verizon Business Network Services, Inc. further stipulates that it will not seek dismissal of the Complaint against Verizon Business Network Services, Inc. pursuant to Rule 12(b)(7) of the Federal Rules of Civil Procedure for failure of Plaintiff to join Verizon Communications, Inc. as a defendant pursuant to Rule 19.

7. "Verizon Business Network Services, Inc." should be substituted for "Verizon Business" in the caption of the proceeding to accurately reflect the name of the defendant.

8. QCC is a wholly-owned subsidiary of Qwest Services Corporation, which in turn is a wholly-owned subsidiary of QCII.

9. QCC is registered as a Telecommunications Company and is responsible for voice and high-speed data transport throughout the country. QCII does not conduct business in Alabama and has no involvement with the subject matter of the Complaint.

10. QCII stipulates that QCC is properly joined as a defendant in the Complaint and further stipulates that it will not seek dismissal of the Complaint against QCC for failure of Plaintiff to join QCC as a defendant pursuant to Rules 12(b)(7) and 19, nor

shall QCC seek dismissal of the Complaint against QCC for insufficiency of process or insufficiency of service of process pursuant to Rules 12(b)(4) or 12(b)(5).

11. QCC should be substituted for QCII in the caption of the proceeding to accurately reflect the name of the defendant.

12. Because the Joint Movants have stipulated to the identity of the proper parties to this action, Fictitious Defendants A, B, C, and D should be dismissed with prejudice.

A proposed Order is attached hereto.

DATED: November 6, 2006

Respectfully submitted,

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JONATHAN M. HOOKS (HOO032)
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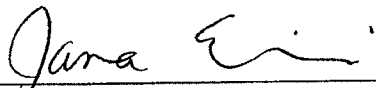
CORPORATE DISCLOSURE STATEMENTS

Qwest Communications Corporation submits the following corporate disclosure statement:

Qwest Communications Corporation. Qwest Communications Corporation ("QCC") provides telecommunications services in the business and consumer markets. QCC is a Delaware corporation with its principal place of business in Denver, Colorado.

QCC's ultimate parent is Qwest Communications International, Inc. ("QCII"), a Delaware Corporation. QCII is a publicly held corporation that has no parent company. Legg Mason, Inc. (through various wholly owned subsidiaries,) holds 14% of the stock of QCII. No other publicly held company owns more than 10% of the stock of QCII.

Dated this 2nd day of November, 2006.

By 
Jana Eisinger, Sr. Attorney
Qwest Communications Corporation

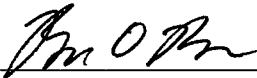
Corporate Disclosure Statement

Verizon Business Network Services Inc. ("Verizon Business") hereby submits the following corporate disclosure statement:

Verizon Business Network Services Inc.: Verizon Business is a wholly owned subsidiary of MCI Communications Corporation, which is a wholly owned subsidiary of MCI, LLC. MCI, LLC is a wholly owned subsidiary of Verizon Communications Inc., a publicly held corporation. Verizon Communications Inc. does not have a parent company, and no publicly held company has a ten percent or greater interest in it.

DATED: November 6, 2006

Respectfully submitted,



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FARMERS)
TELECOMMUNICATIONS)
COOPERATIVE, INC.,)

Plaintiff,)

v.)

CIVIL CASE NO. 2:06cv-790-VPM

VERIZON COMMUNICATIONS INC.,)
VERIZON BUSINESS NETWORK)
SERVICES INC., QWEST)
COMMUNICATIONS)
INTERNATIONAL, INC., and Fictitious)
Defendants A, B, C, and D,)

Defendants.

[PROPOSED] ORDER

WHEREFORE, upon consideration of the joint motion submitted by Farmers Telecommunications Cooperative, Inc. Verizon Communications, Inc., Verizon Business Network Services, Inc., and Qwest Communications International, Inc., and for good cause shown, the Joint Motion to Dismiss Verizon Communications, Inc. and Qwest Communications International, Inc. as Defendants and to Substitute Parties is hereby **GRANTED**, and Verizon Communications, Inc. and Qwest Communications International, Inc. are hereby dismissed, with prejudice, as defendants. "Verizon Business Network Services, Inc." is hereby substituted for "Verizon Business" in the caption of the proceeding, "Qwest Communications Corporation" is hereby added to the caption of the proceeding, and all fictitious parties are hereby dismissed with prejudice.

IT IS SO ORDERED

DATED: _____

VANZETTA P. MCPHERSON
UNITED STATES MAGISTRATE JUDGE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

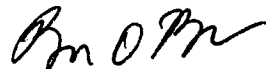
CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and have also served a copy of the foregoing by U.S. Mail to the following:

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